

The Honorable John H. Chun

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AMAZON.COM, INC.,

Defendant.

No. 2:23-cv-0932-JHC

**STIPULATED MOTION AND  
[PROPOSED] ORDER EXTENDING  
DEADLINE FOR PARTIES TO  
SUBMIT PROTECTIVE ORDER**

**NOTE ON MOTION CALENDAR:  
July 21, 2023**

STIPULATED MOTION

The parties, by and through their attorneys of record, respectfully request that the Court enter the proposed order set forth below, which extends the deadline from July 24, 2023, until August 11, 2023, for the parties to submit a joint stipulated proposed protective order or, if the parties are unable to reach an agreement, two separate proposed protective orders accompanied by a joint submission describing each party's justification for its proposal.

In support of this request, the parties represent the following to the Court:

1. On July 5, 2023, the Court entered an order directing the parties, on or before July 24, 2023, to submit a joint stipulated proposed protective order or, if the parties are unable to reach an agreement, two separate proposed protective orders, accompanied by a joint submission describing each party's justification for its proposal. Dkt. 14 at 2–3. Accordingly, absent an extension of time, the parties' deadline to submit a joint stipulated proposed protective

STIPULATED MOTION AND  
[PROPOSED] ORDER EXTENDING DEADLINE  
FOR PARTIES TO SUBMIT PROTECTIVE ORDER  
(2:23-cv-0932-JHC) - 1  
4880-4440-2289v.4 0051461-005818

Davis Wright Tremaine LLP  
LAW OFFICES  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
206.622.3150 main · 206.757.7700 fax

1 order or joint submission describing each party's justification for its proposed protective order is  
2 July 24, 2023.

3 2. The parties have exchanged multiple drafts of a proposed protective order and  
4 have engaged in ongoing discussions in an effort to eliminate or at least narrow areas in dispute.

5 3. In order for the parties to continue their ongoing discussions and to attempt to  
6 reach agreement regarding the terms of a proposed stipulated protective order, the parties agree  
7 (subject to Court approval) to extend from July 24, 2023, until to August 11, 2023, the deadline  
8 for the parties to submit a joint stipulated proposed protective order or joint submission  
9 describing each party's justification for its proposed protective order.

10  
11 Stipulated to and respectfully submitted this 21st day of July, 2023, by:

12  
13 DAVIS WRIGHT TREMAINE LLP  
*Attorneys for Defendant*

14 By s/ Kenneth E. Payson  
15 Kenneth E. Payson, WSBA #26369  
16 James Howard, WSBA #37259  
17 920 Fifth Avenue, Suite 3300  
18 Seattle, WA 98104-1610  
19 Telephone: (206) 622-3150  
20 Fax: (206) 757-7700  
21 E-mail: kenpayson@dwt.com  
22 jimhoward@dwt.com

23 COVINGTON & BURLING LLP

24 Stephen P. Anthony\*  
25 Laura Flahive Wu\*  
26 Laura M. Kim\*  
27 John D. Graubert\*  
850 Tenth Street, NW  
Washington, DC 20001  
Telephone: (206) 662-5105  
E-mail: santhony@cov.com  
lflahivewu@cov.com  
lkim@cov.com  
jgraubert@cov.com

28 STIPULATED MOTION AND  
29 [PROPOSED] ORDER EXTENDING DEADLINE  
30 FOR PARTIES TO SUBMIT PROTECTIVE ORDER  
31 (2:23-cv-0932-JHC) - 2  
32 4880-4440-2289v.4 0051461-005818

Davis Wright Tremaine LLP  
LAW OFFICES  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
206.622.3150 main · 206.757.7700 fax

John E. Hall\*  
415 Mission Street, Suite 5400  
San Francisco, CA 94105  
Telephone: (415) 591-6855  
E-mail: jhall@cov.com

Megan L. Rodgers\*  
3000 El Camino Real  
Palo Alto, CA 94306  
Telephone: (650) 632-4734  
E-mail: mrodgers@cov.com

HUESTON HENNIGAN LLP

John C. Hueston\*  
Moez M. Kaba\*  
Joseph A. Reiter\*  
523 West 6th Street, Suite 400  
Los Angeles, CA 90014  
Telephone: (213) 788-4340  
E-mail: jhueston@hueston.com  
mkaba@hueston.com  
jreiter@hueston.com

*\*admitted pro hac vice*

*Approved and Agreed To By:*

FEDERAL TRADE COMMISSION  
*Attorneys for Plaintiff*

By s/ Evan Mendelson

Evan Mendelson, D.C. Bar #996765  
Olivia Jerjian, D.C. Bar #1034299  
Thomas Maxwell Nardini, IL Bar  
#6330190  
600 Pennsylvania Avenue NW  
Washington, DC 20580  
(202) 326-3320; emendelson@ftc.gov  
(202) 326-2749; ojerjian@ftc.gov  
(202) 326-2812; tnardini@ftc.gov

Colin D. A. McDonald, WSBA #55243  
Federal Trade Commission  
915 Second Ave., Suite 2896  
Seattle, WA 98174  
(206) 220-4474; cmacdonald@ftc.gov

STIPULATED MOTION AND  
[PROPOSED] ORDER EXTENDING DEADLINE  
FOR PARTIES TO SUBMIT PROTECTIVE ORDER  
(2:23-cv-0932-JHC) - 3  
4880-4440-2289v.4 0051461-005818

Davis Wright Tremaine LLP  
LAW OFFICES  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
206.622.3150 main · 206.757.7700 fax

ORDER

IT IS SO ORDERED.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

---

JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE

Presented By:  
DAVIS WRIGHT TREMAINE LLP  
*Attorneys for Defendant*

By s/ Kenneth E. Payson  
Kenneth E. Payson, WSBA #26369  
James Howard, WSBA #37259  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
Telephone: (206) 622-3150  
Fax: (206) 757-7700  
E-mail: kenpayson@dwt.com  
jimhoward@dwt.com

COVINGTON & BURLING LLP

Stephen P. Anthony\*  
Laura Flahive Wu\*  
Laura M. Kim\*  
John D. Graubert\*  
850 Tenth Street, NW  
Washington, DC 20001  
Telephone: (206) 662-5105  
E-mail: santhony@cov.com  
lflahivewu@cov.com  
lkim@cov.com  
jgraubert@cov.com

John E. Hall\*  
415 Mission Street, Suite 5400  
San Francisco, CA 94105  
Telephone: (415) 591-6855  
E-mail: jhall@cov.com

STIPULATED MOTION AND  
[PROPOSED] ORDER EXTENDING DEADLINE  
FOR PARTIES TO SUBMIT PROTECTIVE ORDER  
(2:23-cv-0932-JHC) - 4  
4880-4440-2289v.4 0051461-005818

Davis Wright Tremaine LLP  
LAW OFFICES  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
206.622.3150 main · 206.757.7700 fax

1 Megan L. Rodgers\*  
2 3000 El Camino Real  
3 Palo Alto, CA 94306  
4 Telephone: (650) 632-4734  
5 E-mail: mrodgers@cov.com

6 HUESTON HENNIGAN LLP

7 John C. Hueston\*  
8 Moez M. Kaba\*  
9 Joseph A. Reiter\*  
10 523 West 6th Street, Suite 400  
11 Los Angeles, CA 90014  
12 Telephone: (213) 788-4340  
13 E-mail: jhueston@hueston.com  
14 mkaba@hueston.com  
15 jreiter@hueston.com

16 \*admitted pro hac vice

17 FEDERAL TRADE COMMISSION  
18 *Attorneys for Plaintiff*

19 By s/ Evan Mendelson

20 Evan Mendelson, D.C. Bar #996765  
21 Olivia Jerjian, D.C. Bar #1034299  
22 Thomas Maxwell Nardini, IL Bar #6330190  
23 600 Pennsylvania Avenue NW  
24 Washington, DC 20580  
25 (202) 326-3320; emendelson@ftc.gov  
26 (202) 326-2749; ojerjian@ftc.gov  
27 (202) 326-2812; tnardini@ftc.gov

Colin D. A. McDonald, WSBA #55243  
Federal Trade Commission  
915 Second Ave., Suite 2896  
Seattle, WA 98174  
(206) 220-4474; cmacdonald@ftc.gov

28 STIPULATED MOTION AND  
29 [PROPOSED] ORDER EXTENDING DEADLINE  
30 FOR PARTIES TO SUBMIT PROTECTIVE ORDER  
31 (2:23-cv-0932-JHC) - 5  
32 4880-4440-2289v.4 0051461-005818

Davis Wright Tremaine LLP  
LAW OFFICES  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
206.622.3150 main · 206.757.7700 fax